

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----	X	
MICHAEL MULGREW, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	
	:	
- against -	:	1:24-cv-01644 (LJL)
	:	1:23-cv-10365 (LJL)
UNITED STATES DEPARTMENT OF	:	
TRANSPORTATION, <i>et al.</i> ,	:	
	:	
Defendants.	:	
	:	
-----	X	
ELIZABETH CHAN, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	
	:	
- against -	:	
	:	
UNITED STATES DEPARTMENT OF	:	
TRANSPORTATION, <i>et al.</i> ,	:	
	:	
Defendants.	:	
	:	
-----	X	

**PLAINTIFFS’ NOTICE OF MOTION FOR SUMMARY JUDGMENT**

**PLEASE TAKE NOTICE** that upon the accompanying Memorandum of Law, dated December 2, 2024, and upon all prior pleading and proceedings herein, Plaintiffs in the above-captioned matters, by and through the undersigned counsel, will move this Court on December 20, 2024, before the Honorable Louis J. Liman, United States District Judge, at the United States Courthouse, Southern District of New York, 500 Pearl Street, New York, NY 10007-1312, for an order, pursuant to Local Rule 7.1 and Rule 56 of the Federal Rules of Civil Procedure, granting Plaintiffs’ Motion for Summary Judgment and for such other and further relief as this Court deems proper.

**PLEASE TAKE FURTHER NOTICE** that per the parties’ schedule, “So-Ordered” by the Court on November 27, 2024 (Dkt. Nos. 120, 132), Defendants’ opposition to the motion, if any, is

due no later than December 9, 2024; and reply, if any, is due no later than December 12, 2024.

Dated: New York, New York  
December 2, 2024

**STEPTOE LLP**

By: /s/ Alan M. Klinger  
Alan M. Klinger  
Dina Kolker  
David Kahne  
1114 Avenue of the Americas  
New York, New York 10036  
(212) 506-3900  
aklinger@steptoe.com

*Co-Counsel for the Mulgrew and Chan Plaintiffs*

Of Counsel:

-and-

Carly Rolph  
Alexander Langer

BETH A. NORTON, Esq.  
United Federation of Teachers  
52 Broadway  
New York, NY 10004  
(212) 701-9420

*Co-Counsel for the United Federation of Teachers  
and Individual Plaintiffs*

-and-

THE OFFICE OF LOUIS GELORMINO,  
Esq. & FONTE & GELORMINO LEGAL  
GROUP  
2550 Victory Blvd.  
Suite 304  
Staten Island, NY 10314  
(917) 968-1619  
(718) 720-4949

*Co-Counsel for Vito J. Fossella*